

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
KLEHR HARRISON HARVEY BRANZBURG, LLP (A Pennsylvania Limited Liability Partnership) Morton R. Branzburg, Esquire Carol Ann Slocum, Esquire mbranzburg@klehr.com cslocum@klehr.com 10000 Lincoln Drive East, Suite 210 Marlton, NJ 08053 <i>Counsel for Beasley, Allen, Crow, Methvin, Portis, & Miles, P.C.</i>	
BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C. Andy D. Birchfield, Jr., Esq. Ted Meadows, Esq. P. Leigh O'Dell, Esq. andy.birchfield@beasleyallen.com ted.meadows@beasleyallen.com leigh.odell@beasleyallen.com 234 Commerce St. Montgomery, AL 36104 Tel: (334) 269-2343	
In re: LTL MANAGEMENT LLC,¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan Hearing Date: June 2, 2023 at 11:30 a.m.

**BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.'S
JOINDER TO TCC'S OPPOSITION TO THE DEBTOR'S OMNIBUS MOTION
TO COMPEL AND APPLICATION TO SHORTEN TIME**

Beasley, Allen, Crow, Methvin, Portis, & Miles, P.C. ("Beasley Allen"), by and through its counsel, respectfully submits this opposition to Debtor's Omnibus Motion to Compel Identified

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Plaintiff Firms to Supplement Certain Responses to Debtor's Interrogatories and Requests for Production (Dkt. 638) and Application to Shorten Time (Dkt. 639).

Beasley Allen is not a party to or "claimant" in this proceeding. Beasley Allen is counsel for ovarian cancer and mesothelioma plaintiffs with claims against Johnson & Johnson and Debtor LTL Management LLC. The discovery served on Beasley Allen, to which it objected, is not reasonably calculated to lead to the discovery of admissible evidence. The discovery seeks information that is protected by the attorney client and work product privilege and thus, is improper.

Further, Beasley Allen adopts and incorporates the arguments set forth in the Official Committee of Talc Claimants' Opposition to Debtor's Motion to Compel and Application to Shorten Time (Dkt. 659).

WHEREFORE, Beasley Allen respectfully requests that the Court deny the Debtor's Motion in its entirety. Beasley Allen reserves the right to modify or supplement this joinder as necessary and appropriate.

Dated: June 2, 2023

**KLEHR HARRISON HARVEY
BRANZBURG, LLP**

/s/ Carol Ann Slocum
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